

SERGENIAN LAW

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Counsel for Defendant
LAJERRIO JEWELRY

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

VERRAGIO, LTD.,

Plaintiff,

v.

LAJERRIO JEWELRY,

Defendant.

Case No. 2:23-cv-02362-JAK-Ex

Hon. John A. Kronstadt

**DECLARATION OF SHENGMAO
MU IN SUPPORT OF MOTION OF
ATTORNEYS SHENGMAO MU
AND DAVID SERGENIAN FOR
LEAVE TO WITHDRAW AS
COUNSEL OF RECORD FOR
LAJERRIO JEWELRY**

DATE: January 29, 2024

TIME: 8:30 a.m.

CTRM: 10B

DECLARATION OF SHENGMAO MU

I, Shengmao Mu, declare as follows:

1. I am an attorney with the law firm of Whitewood Law PLLC, attorney of record in this action for Defendant Lajerrio Jewelry (“Defendant”). Except where expressly stated on information and belief, I have personal knowledge of the matters set forth below, and if called as a witness I could and would testify competently as follows.

2. There has been a complete breakdown of the attorney-client relationship between Defendant on the one hand and my co-counsel, David Sergenian, and me, which has led Defendant to discharge Mr. Sergenian and me as Defendant’s counsel. Due to the need to keep communications with Defendant privileged, I am constrained from providing further details regarding this breakdown.

3. On December 5, 2023, Defendant informed me that it was discharging Mr. Sergenian and me as Defendant’s counsel in this action, with an effective date of December 7, 2023. I informed Defendant that Mr. Sergenian and I are obligated to seek leave of Court to withdraw as Defendant’s counsel and that we would promptly move for an order granting leave to withdraw as Defendant’s counsel, to which Defendant consented.

4. On December 12, 2023, Defendant’s Counsel met and conferred with Plaintiff’s counsel, Howard A. Kroll and Helena Guye, about the current motion. The meet and confer did not resolve the issues raised in the Motion.

5. Concurrently with this Motion, I am providing a copy of all moving papers to Defendant. In addition, I will promptly provide copies of the opposing papers, the reply papers, if any, and the Court’s order on this Motion to Defendant.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: December 19, 2023

By: /s/Shengmao Mu
SHENGMAO MU